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ABSTRACT

Focusing on the Student Right to Know and Campus Security Act of 1990, this document presents the text of the Act and an implementation plan developed by Missouri's St. Louis Community College (SLCC). The first section provides a general overview of legal issues and student affairs in community colleges, while the second presents the text of the Act as amended by the Higher Education Technical Amendments of 1991, including Title I provisions related to students' right to know outcomes of educational institutions; Title II provisions, dealing with crime awareness and campus security; Title III provisions, regarding the calculation of default rates; and Title IV provisions related to regulations to enforce the Act. The third section presents SLCC's plan for implementing the Act and includes the following sections: (1) a preface describing general requirements imposed by the Act; (2) specific requirements and implementation procedures for sections 103 (i.e., disseminating information on institutional outcomes) and 104 (i.e., disclosing student-athlete outcomes) of Title I; (3) specific requirements and implementation procedures for section 204 of Title II, related to the collection and dissemination of crime information; and (4) a glossary. A description of SLCC's Sexual Assault Awareness Program and procedures for reporting crimes are appended. (HAA)

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ED 410 984

"A LEADERSHIP IMPERATIVE: COMPLYING WITH THE STUDENT RIGHT TO KNOW AND THE CAMPUS SECURITY ACT"

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INTRODUCTION

LEGAL ISSUES AND STUDENT AFFAIRS IN COMMUNITY COLLEGES

For many years now we in Student Development have been involved with legal issues. We have not had the luxury as our colleagues in Instruction that use the "Doctrine of Academic Extension". In other words when credit is given for learning experiences the courts have ruled in favor of the "experts", the College or University.

During the first half of this century, the doctrine of **in loco parentis** authorized colleges and universities to make almost unlimited decisions affecting their students. Attendance at any institution of higher education was a privilege as noted in Gott v. Berea College 161 S.W. 204 (Ct App KY 1913), and Hamilton v. Regents of the University of California, 293 U. S. 245 (1934). A good enough reason to dismiss a student involved not being "a typical Syracuse girl" (Anthony v. Syracuse University, 224 A.D. 487, 231 N.Y. S. 435 (1928)).

During the last half of the century, beginning with the social changes of the 1960's, colleges and universities have seen a major change in this doctrine. Such cases as Healy v. James 92 S. C. 2338 (1972), Widmar v. Vincent, 102 S. Ct 269 (1981) and Bradshaw v. Rawlings, 612 F.2d 135 (3rd Cir. 1979) note the change. Institutions now publish reasonable rules and upon violation a student receives due process. For an excellent example of a model code of conduct read, E. Stoner & K. Cerminara, Harnessing the "Spirit of Insubordination": A Model Student Disciplinary Code, 17 J. College & University Law 89 (1990).

As we approach the next century colleges and universities are seeing a dramatic increase in laws affecting the operation of our institutions. Today the student is viewed as a consumer. The federal dollar has more regulations attached to it and legislators and commissioners are demanding a quantitative and qualitative accounting of our endeavors. With this increase we find ourselves seeking the advice of legal counsel on a regular basis. The student development professional must establish and maintain a trusted relationship with legal counsel. Both parties need to keep in mind that "doing things right" is often more important than "doing the right thing". Counsel should advise the student development professional on matters of law. The student development professional should make decisions based upon the knowledge received from counsels' advice.

We have yet to feel the significant impact of just three statutes. The Student Right To Know and Campus Security Act of 1990 (P.L. 101-542) as Amended by the Higher Education Technical Amendments of 1991 (P.L. 102-26); the Higher Education Amendments

of 1992 (P. L. 102-325); and the Americans with Disabilities Act of 1990 (P.L. 101-336). Final regulations have yet to be published for the Student Right to Know and Campus Security Act.

The Department of Education has informed us that final regulations should be published soon for the Higher Education Amendments of 1992. As Student Affairs Professionals we should take a leadership role in guiding our community colleges to meet the requirements of these statutes while continuing to serve and respond to our student populations, the under-prepared, the disadvantaged, and the non-traditional.

For purposes of this Forum we will discuss only the Student Right to Know and Campus Security Act.

THE STUDENT RIGHT TO KNOW

AND

CAMPUS SECURITY ACT OF 1990 (P.1. 101-542)

AS AMENDED BY THE HIGHER EDUCATION TECHNICAL AMENDMENTS OF 1991 (P.L. 102-26)

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101ST CONGRESS 2d Session | HOUSE OF REPRESENTATIVES | REPORT 101-883

STUDENT RIGHT-TO-KNOW AND CAMPUS SECURITY ACT

OCTOBER 16, 1990.—Ordered to be printed

Mr. WILLIAMS, from the committee on conference, submitted the following

CONFERENCE REPORT

[To accompany S. 580]

The committee of conference on the disagreeing votes of the two Houses on the amendment of Senate to the amendment of the House to the bill (S. 580), to require institutions of higher education receiving Federal financial assistance to provide certain information with respect to the graduation rates of student-athletes at such institutions, having met, after full and free conference, have agreed to recommend and do recommend to their respective Houses as follows:

That the House recede from its disagreement to the amendment of Senate to the amendment of the House and agree to the same with an amendment as follows:

In lieu of the matter proposed to be inserted by the Senate amendment, insert the following:

SECTION 1. SHORT TITLE.

This Act may be cited as the "Student Right-To-Know and Campus Security Act".

TITLE I—STUDENT RIGHT-TO-KNOW

SEC. 101. SHORT TITLE.

This title may be cited as the "Student Right-To-Know Act".

SEC. 102. FINDINGS.

The Congress finds that—

(1) education is fundamental to the development of individual citizens and the progress of the Nation as a whole;

(2) there is increasing concern among citizens, educators, and public officials regarding the academic performance of students at institutions of higher education;

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(3) a recent study by the National Institute of Independent Colleges and Universities found that just 43 percent of students attending 4-year public colleges and universities and 54 percent of students entering private institutions graduated within 6 years of enrolling;

(4) the academic performance of student athletes, especially student athletes receiving football and basketball scholarships, has been a source of great concern in recent years;

(5) more than 10,000 athletic scholarships are provided annually by institutions of higher education;

(6) prospective students and prospective student athletes should be aware of the educational commitments of an institution of higher education; and

(7) knowledge of graduation rates would help prospective students and prospective student athletes make an informed judgment about the educational benefits available at a given institution of higher education.

SEC. 103. ADDITIONAL GENERAL DISCLOSURE REQUIREMENTS RELATING TO COMPLETION OR GRADUATION.

(a) DISCLOSURE OF COMPLETION OR GRADUATION RATES.—Section 485(a)(1) of the Higher Education Act of 1965 (20 U.S.C. 1092(a)(1)) (in this Act referred to as the "Act") is amended—

(1) by striking "and" at the end of subparagraph (J);

(2) by striking the period at the end of subparagraph (K) and inserting "; and"; and

(3) by adding at the end thereof the following new subparagraph:

"(L) the completion or graduation rate of certificate- or degree-seeking, full-time students entering such institutions.".

(b) CONSTRUCTION OF DISCLOSURE REQUIREMENTS.—Section 485(a) of such Act (42 U.S.C. 1092(a)) is further amended by inserting after paragraph (2) the following new paragraph:

"(3) In calculating the completion or graduation rate under subparagraph (L) of paragraph (1) of this subsection or under subsection (e), a student shall be counted as a completion or graduation if, within 150 percent of the normal time for completion of or graduation from the program, the student has completed or graduated from the program, or enrolled in any program of an eligible institution for which the prior program provides substantial preparation. The information required to be disclosed under such subparagraph—

"(A) shall be available beginning on July 1, 1993, and each year thereafter to current and prospective students prior to enrolling or entering into any financial obligation;

"(B) shall cover the one-year period ending on June 30 of the preceding year; and

"(C) shall be updated not less than biennially.

"(4) For purposes of this section, institutions may exclude from the information disclosed in accordance with subparagraph (L) of paragraph (1) the completion or graduation rates of students who leave school to serve in the armed services, on official church missions, or with a recognized foreign aid service of the Federal Government.".

(c) ANALYSIS OF POTENTIAL INSTITUTIONAL OUTCOMES.—(1) In conjunction with representatives of institutions of higher education, the Secretary shall analyze the feasibility and desirability of making available to students and potential students—

(A) the completion or graduation rate of individuals at an institution broken down by program or field of study;

(B) the completion or graduation rate of an institution reported by individual schools or academic divisions within the institution;

(C) the rate at which individuals who complete or graduate from the program of an institution pass applicable licensure or certification examinations required for employment in a particular vocation, trade, or professional field;

(D) the rate at which individuals who complete or graduate from an occupationally specific program and who enter the labor market following completion of or graduation from such a program obtain employment in the occupation for which they are trained; and

(E) other institutional outcomes that may be appropriate.

(2) In calculating the completion or graduation rate under paragraph (1), a student shall be counted as a completion or graduation if, within 150 percent of the normal time for completion of or graduation from the program, the student has completed or graduated from the program, or enrolled in any program of an eligible institution for which the prior program provides substantial preparation.

(d) REPORT.—The Secretary shall submit a report to the appropriate committees of Congress before August 1, 1991 on the analysis conducted pursuant to subsection (c).

SEC. 104. REPORTING REQUIREMENTS FOR INSTITUTIONS OF HIGHER EDUCATION.

(a) AMENDMENT.—Section 485 of the Act (20 U.S.C. 1092) (as amended by section 103) is further amended by adding at the end thereof the following new subsection:

"(e) DISCLOSURES REQUIRED WITH RESPECT TO ATHLETICALLY RELATED STUDENT AID.—(1) Each institution of higher education which participates in any program under this title and is attended by students receiving athletically related student aid shall annually submit a report to the Secretary which contains—

"(A) the number of students at the institution of higher education who received athletically related student aid broken down by race and sex in the following sports: basketball, football, baseball, cross country/track, and all other sports combined;

"(B) the number of students at the institution of higher education, broken down by race and sex;

"(C) the completion or graduation rate for students at the institution of higher education who received athletically related student aid broken down by race and sex in the following sports: basketball, football, baseball, cross country/track and all other sports combined;

"(D) the completion or graduation rate for students at the institution of higher education, broken down by race and sex;

"(E) the average completion or graduation rate for the 4 most recent completing or graduating classes of students at the institution of higher education who received athletically related student aid broken down by race and sex in the following categories: basketball, football, baseball, cross country/track, and all other sports combined; and

"(F) the average completion or graduation rate for the 4 most recent completing or graduating classes of students at the institution of higher education broken down by race and sex.

"(2) When an institution described in paragraph (1) of this subsection offers a potential student athlete athletically related student aid, such institution shall provide to the student and his parents, his guidance counselor, and coach the information contained in the report submitted by such institution pursuant to paragraph (1).

"(3) For purposes of this subsection, institutions may exclude from the reporting requirements under paragraphs (1) and (2) the completion or graduation rates of students and student athletes who leave school to serve in the armed services, on official church missions, or with a recognized foreign aid service of the Federal Government.

"(4) Each institution of higher education described in paragraph (1) may provide supplemental information to students and the Secretary showing the completion or graduation rate when such completion or graduation rate includes students transferring into and out of such institution.

"(5) The Secretary, using the reports submitted under this subsection, shall compile and publish a report containing the information required under paragraph (1) broken down by—

"(A) individual institutions of higher education; and

"(B) athletic conferences recognized by the National Collegiate Athletic Association and the National Association of Intercollegiate Athletics.

"(6) The Secretary shall waive the requirements of this subsection for any institution of higher education that is a member of an athletic association or athletic conference that has voluntarily published completion or graduation rate data or has agreed to publish data that, in the opinion of the Secretary, is substantially comparable to the information required under this subsection.

"(7) The Secretary, in conjunction with the National Junior College Athletic Association, shall develop and obtain data on completion or graduation rates from two-year colleges that award athletically related student aid. Such data shall, to the extent practicable, be consistent with the reporting requirements set forth in this section.

"(8) For purposes of this subsection, the term 'athletically related student aid' means any scholarship, grant, or other form of financial assistance the terms of which require the recipient to participate in a program of intercollegiate athletics at an institution of higher education in order to be eligible to receive such assistance.".

(b) EFFECTIVE DATE.—The amendments made by this section shall take effect July 1, 1992, except that the first report to the Secretary of Education shall be due on July 1, 1993.

SEC. 105. ANALYSIS OF ATHLETIC ACTIVITY REVENUES.

(a) IN GENERAL.—The Secretary, in conjunction with institutions of higher education and collegiate athletic associations, shall analyze the feasibility of and make recommendations regarding a requirement that institutions of higher education compile and report on the revenues derived and expenditures made (per sport) by such institutions' athletic department and intercollegiate athletic activities.

(b) REPORTS.—The Secretary shall prepare a report on the activities described in subsection (a) and transmit such report to the appropriate committees of Congress before April 1, 1991.

TITLE II—CRIME AWARENESS AND CAMPUS SECURITY

SEC. 201. SHORT TITLE.

This title may be cited as the "Crime Awareness and Campus Security Act of 1990".

SEC. 202. FINDINGS.

The Congress finds that—

(1) the reported incidence of crime, particularly violent crime, on some college campuses has steadily risen in recent years;

(2) although annual "National Campus Violence Surveys" indicate that roughly 80 percent of campus crimes are committed by a student upon another student and that approximately 95 percent of the campus crimes that are violent are alcohol- or drug-related, there are currently no comprehensive data on campus crimes;

(3) out of 8,000 postsecondary institutions participating in Federal student aid programs, only 352 colleges and universities voluntarily provide crime statistics directly through the Uniform Crime Report of the Federal Bureau of Investigation, and other institutions report data indirectly, through local police agencies or States, in a manner that does not permit campus statistics to be separated;

(4) several State legislatures have adopted or are considering legislation to require reporting of campus crime statistics and dissemination of security practices and procedures, but the bills are not uniform in their requirements and standards;

(5) students and employees of institutions of higher education should be aware of the incidence of crime on campus and policies and procedures to prevent crime or to report occurrences of crime;

(6) applicants for enrollment at a college or university, and their parents, should have access to information about the crime statistics of that institution and its security policies and procedures; and

(7) while many institutions have established crime preventive measures to increase the safety of campuses, there is a clear need—

(A) to encourage the development on all campuses of security policies and procedures;

(B) for uniformity and consistency in the reporting of crimes on campus; and

(C) to encourage the development of policies and procedures to address sexual assaults and racial violence on college campuses.

SEC. 203. DISCLOSURE OF DISCIPLINARY PROCEEDING OUTCOMES TO CRIME VICTIMS.

Section 438(b) of the General Education Provisions Act (20 U.S.C. 1232g(b)) is amended by adding at the end thereof the following new paragraph:

"(6) Nothing in this section shall be construed to prohibit an institution of postsecondary education from disclosing, to an alleged victim of any crime of violence (as that term is defined in section 16 of title 18, United States Code), the results of any disciplinary proceeding conducted by such institution against the alleged perpetrator of such crime with respect to such crime.".

SEC. 204. DISCLOSURE OF CAMPUS SECURITY POLICY AND CAMPUS CRIME STATISTICS.

(a) DISCLOSURE REQUIREMENTS.—Section 485 of the Act (20 U.S.C. 1092) (as amended by sections 103 and 104) is further amended by adding at the end thereof the following new subsection:

"(f) DISCLOSURE OF CAMPUS SECURITY POLICY AND CAMPUS CRIME STATISTICS.—(1) Each eligible institution participating in any program under this title shall on September 1, 1991, begin to collect the following information with respect to campus crime statistics and campus security policies of that institution, and beginning September 1, 1992, and each year thereafter, prepare, publish, and distribute, through appropriate publications or mailings, to all current students and employees, and to any applicant for enrollment or employment upon request, an annual security report containing at least the following information with respect to the campus security policies and campus crime statistics of that institution:

"(A) A statement of current campus policies regarding procedures and facilities for students and others to report criminal actions or other emergencies occurring on campus and policies concerning the institution's response to such reports.

"(B) A statement of current policies concerning security and access to campus facilities, including campus residences, and security considerations used in the maintenance of campus facilities.

"(C) A statement of current policies concerning campus law enforcement, including—

"(i) the enforcement authority of security personnel, including their working relationship with State and local police agencies; and

"(ii) policies which encourage accurate and prompt reporting of all crimes to the campus police and the appropriate police agencies.

"(D) A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others.

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"(E) A description of programs designed to inform students and employees about the prevention of crimes.

"(F) Statistics concerning the occurrence on campus, during the most recent school year, and during the 2 preceding school years for which data are available, of the following criminal offenses reported to campus security authorities or local police agencies—

"(i) murder;

"(ii) rape;

"(iii) robbery;

"(iv) aggravated assault;

"(v) burglary; and

"(vi) motor vehicle theft.

"(G) A statement of policy concerning the monitoring and recording through local police agencies of criminal activity at off-campus student organizations which are recognized by the institution and that are engaged in by students attending the institution, including those student organizations with off-campus housing facilities.

"(H) Statistics concerning the number of arrests for the following crimes occurring on campus:

"(i) liquor law violations;

"(ii) drug abuse violations; and

"(iii) weapons possessions.

"(I) A statement of policy regarding the possession, use, and sale of alcoholic beverages and enforcement of State underage drinking laws and a statement of policy regarding the possession, use, and sale of illegal drugs and enforcement of Federal and State drug laws and a description of any drug or alcohol abuse education programs as required under section 1213 of this Act.

"(2) Nothing in this subsection shall be construed to authorize the Secretary to require particular policies, procedures, or practices by institutions of higher education with respect to campus crimes or campus security.

"(3) Each institution participating in any program under this title shall make timely reports to the campus community on crimes considered to be a threat to other students and employees described in paragraph (1)(F) that are reported to campus security or local law police agencies. Such reports shall be provided to students and employees in a manner that is timely and that will aid in the prevention of similar occurrences.

"(4) Upon the request of the Secretary, each institution participating in any program under this title shall submit to the Secretary a copy of the statistics required to be made available under paragraphs (1)(F) and (1)(H). The Secretary shall—

"(A) review such statistics and report to the Committee on Education and Labor of the House of Representatives and the Committee on Labor and Human Resources of the Senate on campus crime statistics by September 1, 1995; and

"(B) in coordination with representatives of institutions of higher education, identify exemplary campus security policies, procedures, and practices and disseminate information concern-

ing those policies, procedures, and practices that have proven effective in the reduction of campus crime.

"(5)(A) For purposes of this subsection, the term 'campus' includes—

"(i) any building or property owned or controlled by the institution of higher education within the same reasonably contiguous geographic area and used by the institution in direct support of, or related to its educational purposes; or

"(ii) any building or property owned or controlled by student organizations recognized by the institution.

"(B) In cases where branch campuses of an institution of higher education, schools within an institution of higher education, or administrative divisions within an institution are not within a reasonably contiguous geographic area, such entities shall be considered separate campuses for purposes of the reporting requirements of this section.

"(6) The statistics described in paragraphs (1)(F) and (1)(H) shall be compiled in accordance with the definitions used in the uniform crime reporting system of the Department of Justice, Federal Bureau of Investigation, and the modifications in such definitions as implemented pursuant to the Hate Crime Statistics Act.".

(c) EFFECTIVE DATES.—The amendments made by this section shall take effect on September 1, 1991, except that the requirement of section 485(f)(1) (F) and (H) of the Higher Education Act of 1965 (as added by this section) shall be applied to require statistics with respect to school years preceding the date of enactment of this Act only to the extent that data concerning such years is reasonably available.

SEC. 205. PROGRAM PARTICIPATION AGREEMENT REQUIREMENTS.

Section 487(a) of the Act (20 U.S.C. 1094(a)) is amended by adding at the end thereof the following new paragraph:

"(12) The institution certifies that—

"(A) the institution has established a campus security policy; and

"(B) the institution has complied with the disclosure requirements of section 485(f).".

TITLE III—CALCULATION OF DEFAULT RATES

SEC. 301. CALCULATION OF DEFAULT RATES.

Section 435 of the Act (20 U.S.C. 1085) is amended—

(1) in subsection (l), by striking out "The term" and inserting in lieu thereof "Except as provided in subsection (m), the term"; and

(2) in subsection (m), by inserting immediately after the first sentence the following: "In determining the number of students who default before the end of such fiscal year, the Secretary shall include only loans for which the Secretary or a guaranty agency has paid claims for insurance, and, in calculating the cohort default rate, exclude any loans which, due to improper

servicing or collection, would result in an inaccurate or incomplete calculation of the cohort default rate.".

TITLE IV—CONFORMING REGULATIONS

SEC. 401. CONFORMING REGULATIONS.

(a) IN GENERAL.—The Secretary is authorized to issue regulations to carry out the provisions of this Act.

(b) SUSPENSION.—Subparagraphs (c) through (f) of section 668.44 of title 34, Code of Federal Regulations, are suspended.

And the Senate agree to the same.

GUS HAWKINS,
WILLIAM D. FORD,
PAT WILLIAMS,
MAJOR R. OWENS,
CARL C. PERKINS,
BILL GOODLING,
TOM COLEMAN,
PAUL B. HENRY,
Managers on the Part of the House.

EDWARD M. KENNEDY,
CLAIBORNE PELL,
CHRISTOPHER J. DODD,
HOWARD M. METZENBAUM,
BARBARA A. MIKULSKI,
ORRIN HATCH,
NANCY LANDON KASSEBAUM,
STROM THURMOND,
THAD COCHRAN,
Managers on the Part of the Senate.

AN IMPLEMENTATION PLAN
FOR
ST. LOUIS COMMUNITY COLLEGE

IN RESPONSE TO THE REQUIREMENTS OF
THE STUDENT RIGHT-TO-KNOW AND CAMPUS SECURITY ACT OF 1990
(PUBLIC LAW 101-542) AS AMENDED BY
THE HIGHER EDUCATION TECHNICAL AMENDMENTS OF 1991
(PUBLIC LAW 102-26)

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Revised Draft
March 11, 1993

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b. Campus Crime Summary Form

Acknowledgements

This document represents the work of a number of persons across the College who met on many occasions to give thought to and discuss Student Right-to-Know issues. Specifically, much credit is due the College-wide Disclosure Requirements Committee comprised of the following persons:

(1) Edwin Bailey - Student Development - Meramec
(2) Jean Belt - Admissions - Meramec
(3) Russ Dippold - P.E. and Athletics - Forest Park
(4) Bill Reed - College Police - Florissant Valley
(5) Rosemary Woolley - Student Development - Florissant Valley
(6) John Cosgrove - Institutional Research and Planning - College Center (ex-officio)

The committee was formed in response to a request from Dr. Michael Murphy that a College-wide group be charged with the responsibility for reviewing, discussing and developing an implementation strategy for Public Law 101-542. The initial meeting of the committee was held on April 29, 1991. At that time, each of the three major dimensions of the statute was assigned to a sub-committee for in-depth analysis. The full committee then met again on several occasions to share information and to report on concerns and questions raised during the sub-committee review sessions. John Cosgrove provided advice and technical assistance throughout the process. Also, other College staff were asked for their input.

Following receipt of an August 1991 Dear Colleague Letter from the Department of Education (which provided clarification to post-secondary institutions relative to several disclosure-related terms and concepts) the committee met again to reach consensus on previously discussed topics. ~~The plan that follows, in large part, reflects agreements and understandings of the committee as of that meeting.~~ **In July of 1992, the Department of Education disseminated Part V, 34CFR, Part 668, Student Assistance General Provisions, Proposed Rules to provide further guidance for the postsecondary community. The plan that follows incorporates all relevant information that has been available to the committee to date.**

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Preface

The Student Right-to-Know and Campus Security Act of 1990 was signed into law by President Bush on November 8, 1990. (see Appendix) Considered by many a consumer's rights statute, this legislation requires colleges and universities whose students receive federal aid to disclose and, in some instances, report program completion and graduation rates for students and student athletes. Institutions are also required under this law to maintain and/or report campus security policies and campus crime information to defined audiences.

Coming on the heels of the Department of Education's Default Reduction Initiative's (34 CFR 668.44) consumer disclosure requirements, the Student Right-to-Know Act culminates a lengthy debate that involved, among others, the U.S. Congress, the National Collegiate Athletic Association and the American Council on Education. Both the Default Reduction Initiative and the Student Right-to-Know Act had their genesis in legislation originally proposed by Senator Bill Bradley (D-NJ) and Representative Tom McMillen (D-MD), former basketball players, and Representative Ed Towns (D-NY), all of whom had expressed grave concerns about graduation rates of college athletes.

In addition to requiring institutions to develop and implement a number of procedures designed to significantly reduce their default rates, such as delayed application certification and initial loan counseling, the Default Reduction Initiative also required schools that prepared students for a particular vocational, trade, or career field to disclose completion rates, job placement rates, and State licensing examination pass rates to prospective students via a now infamous "Track Record Disclosure Form."[4] On an annual basis, track record forms on individual vocational programs and institutional cost information were required to be submitted by schools to the U.S. Department of Education. In December of 1990, however, the U.S. Department of Education's Dear Colleague Letter Gen-90-41 informed post-secondary institutions that, effective immediately, track record disclosure forms would no longer be required.

The three major dimensions of Public Law 101-542 are:

(1) Title I - Section 103

addressing disclosure of program completion and graduation rates for specifically defined student cohorts;

(2) Title I - Section 104

addressing disclosure of program completion and graduation rates for specifically defined cohorts of students receiving athletically-related student aid; and,

(3) Title II - Section 204

addressing the reporting, to defined audiences, of campus crime statistics and security policies.

The implementation plan described in the body of this document represents not only St. Louis Community College's responses to the legal requirements of those three dimensions, but also a manifestation of the College's desire to utilize a comprehensive longitudinal student cohort tracking system for internal purposes that transcend federal mandates. The plan ~~was~~ **has been** developed using the Department of Education's August 1991 "Dear Colleague" letter ~~as a guide~~ **and July 10, 1992 Student Assistance General Provisions Proposed Rules as guides.**

It is important to note the fact that, while the August 1991 "Dear Colleague" letter **and the July 10, 1992 Proposed Rules** referenced above provide significant direction (safe harbors) to affected institutions regarding minimum reporting requirements via the Higher Education Technical Amendments (P.L. 102-26), it is very likely that final regulations addressing the Student Right-to-Know statute will not be published until ~~June or July of 1992~~ **fall of 1993.** For the present, the Secretary of the Department of Education strongly recommends that institutions use the guidelines presented **thus far** ~~in the August "Dear Colleague" letter~~ and has assured institutions that if they follow ~~policies contained therein~~ **current policy statements in their present form**, they will be in compliance with federal law.

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TITLE I

SECTION - 103

REQUIREMENTS AND IMPLEMENTATION PROCEDURES - SECTION 103

1. Requirement

Institutions are required to produce and make readily available to current students and to each prospective student enrolling or entering into any financial obligation, the completion or graduation rates of **designated cohorts of** certificate or degree-seeking, **first-time** full-time undergraduate students entering the institution.

Implementation Procedure

St. Louis Community College will accommodate the requirement stated above by producing on an annual basis a publication that will provide necessary information to defined students. The publication will be readily available to students, both current and prospective. All completion or graduation rates will be developed using "safe harbor" guidelines **provided by the U. S. Department of Education.**

Responsible Department/Office/Individual

St. Louis Community College's office of Institutional Research and Planning will be responsible for producing completion **and** graduation ~~and persistence~~ rates of cohort members on an on-going basis.

The specific publication which will be used to disclose to current and prospective students will be produced by the College-wide Community Relations staff. The offices of Student Development of the College will be responsible for distribution of the publication.

2. Requirement

Institutions must make this information available beginning July 1, 1993 and annually thereafter on July 1. The period of time covered by each report is the one-year period ending on June 30 of the preceding year. For the first report, due on July 1, 1993, ~~institutions will report the completion or graduation rate for the period July 1, 1991 through June 30, 1992.~~ **institutions will report the completion or graduation rates for the most recent cohort of entering students that all have had an opportunity to graduate.** The time when an institution is capable of disclosing the completion or graduation rate specified by P.L. 101-542 depends upon the length of the institution's program(s).

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Implementation Procedure

St. Louis Community College will make the required information available according to the schedule outlined below:

a. Six-month Programs - Information will be made available on July 1, ~~1995~~ 1993.

b. One-year Programs - Information will be made available on July 1, ~~1995~~ 1993.

c. Two-year Programs - Information will be made available on July 1, ~~1995~~ 1993.

Responsible Department/Office/Individual

The timely reporting of required institutional disclosures will be jointly monitored by the office of Institutional Research and Planning and the Student Development offices of the College.

3. Requirement

Institutions must establish "cohorts" of students to ~~follow~~ **track** relative to the reporting requirements of P.L. 101-542.

Implementation Procedure

St. Louis Community College will establish for its first disclosures July 1, ~~1995~~ 1993, a cohort using fall ~~1991~~ 1989 enrollment and any students enrolled between July 1, ~~1991~~ 1989 and the fall ~~1991~~ 1989 enrollment who continued into fall enrollment. Also, the cohort will be established using definitions ~~recommended~~ **provided** by the U.S. Secretary of Education (see Glossary). For future disclosures, cohorts will be established each fall semester according to existing federal guidelines.

Responsible Department/Office/Individual

St. Louis Community College's office of Institutional Research and Planning will be responsible for establishing cohorts on an annual basis using guidelines provided by the Department of Education.

4. Requirement

~~In lieu of publishing completion or graduation rates for programs for which 150% of the normal time for completion or graduation has not lapsed, institutions must publish~~

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~~"persistence" rates to permit a gradual implementation of the act. The "persistence" rate is the percentage of the students in the cohort who re-enroll each successive year until completion or graduation occurs. In order to be counted in the persistence rate, a member of the cohort must re-enroll for the period for which the following cohort will be established.~~ Institutions must disclose the "projected" completion or graduation rate of the cohort of students who entered the institution in the fall of 1991 if, in 1993, the institution cannot calculate the graduation rate of the most recent cohort that has had an opportunity to graduate (i.e., 150 percent of the longest programs) because sufficient data does not exist or would require excessive effort to produce. The institution would continue to disclose the projected graduation rate of the 1991 cohort of entering students until it can either disclose the actual graduation rate of the 1991 cohort or the actual graduation rate of a cohort prior to the 1991 cohort (for which data exists).

Implementation Procedure

St. Louis Community College will not need to address the ~~"persistence"~~ "projected" rate requirement ~~by publishing and making readily available to defined students persistence rates on designated cohorts. Persistence rates will be calculated in concert with the persistence rate definition above. On an annual basis beginning in July 1993, the publication containing persistence rate data will be prepared for student consumption~~ since it presently has sufficient cohort data to accommodate the reporting of completion and graduation rates on an identified group of students.

Responsible Department/Office/Individual

As is stated earlier, St. Louis Community College's office of Institutional Research and Planning will ~~produce institutional persistence rates of cohort members on an on-going basis~~ not have a need to produce "projected" completion or graduation rates.

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TITLE I

SECTION - 104

REQUIREMENTS AND IMPLEMENTATION PROCEDURES - SECTION 104

1. Requirement

Institutions that award athletically-related student aid are required by Section 104 to disclose to potential student athletes, their parents, guidance counselors and coaches and to the Secretary of the Department of Education the following information:

A. the number of **full-time regular** students at the institution of higher education broken down by race and sex;

B. the number of **full-time regular** students at the institution of higher education who received athletically-related student aid broken down by race and sex in the following sports: basketball, football, baseball, cross country/track, and all other sports combined;

C. the completion or graduation rates for **full-time regular** students at the institution of higher education broken down by race and sex;

D. the completion or graduation rates for **full-time regular** students at the institution of higher education who received athletically-related student aid broken down by race and sex in the following sports: basketball, football, baseball, cross country/track, and all other sports combined;

E. the average completion or graduation rates for the four most recent completing or graduating classes of **full-time regular** students at the institution of higher education broken down by race and sex; and

F. the average completion or graduation rates for the four most recent completing or graduation classes of **full-time regular** students at the institution of higher education who received athletically-related student aid broken down by race and sex in the following categories: basketball, football, baseball, cross country/track, and all other sports combined.

Implementation Procedure

St. Louis Community College will provide the information stated above to potential student athletes, their parents, their guidance counselors, their coaches and the Secretary

of Education ~~on~~ **by** July 1, ~~1995~~ **1993**. ~~In the interim, on an annual basis beginning July 1, 1993, the information will be provided using the persistence rate method.~~ The information will be provided via a publication that will be updated at appropriate intervals.

Responsible Department/Office/Individual

St. Louis Community College's office of Institutional Research and Planning will be responsible for providing the data outlined above in Sections A through F. The production of an appropriate informational publication will be the responsibility of the College-wide Community Relations staff. The Inter-collegiate Athletic Departments will be responsible for the distribution of the publication.

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TITLE II

SECTION - 204

REQUIREMENTS AND IMPLEMENTATION PROCEDURES - TITLE II

1. Requirement

Institutions are required to begin to collect crime-related information (described in 2 below) commencing August 1, 1991.

Implementation Procedure

St. Louis Community College is presently, and has been for many years, collecting the crime statistics required by law.

Responsible Department/Office/Individual

The responsibility for collecting crime-related data will reside with the College's Police Departments.

2. Requirement

Institutions are required to prepare, publish, and distribute the following information to all current students and employees and to any applicant for enrollment or employment, upon request, beginning September 1, 1992 and each year thereafter:

A. A statement of current campus policies regarding procedures and facilities for students and others to report criminal actions or other emergencies occurring on campus and policies concerning the institution's response to such reports.

B. A statement of current policies concerning security and access to campus facilities, including campus residences, and security considerations used in the maintenance of campus facilities.

C. A statement of current policies concerning campus law enforcement, including--

(i) the enforcement authority of security personnel, including their working relationship with state and local police agencies; and

(ii) policies which encourage accurate and prompt reporting of all crimes to the campus police and the appropriate police agencies.

D. A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage

students and employees to be responsible for their own security and the security of others.

E. A description of programs designed to inform students and employees about the prevention of crimes.

F. Statistics concerning the occurrence on campus, during the most recent calendar year, and during the two preceding calendar years for which data are available, of the following criminal offenses reported to campus security authorities or local police agencies--

(i) murder;
(ii) ~~rape~~ sex offenses, forcible or non-forcible;
(iii) robbery;
(iv) aggravated assault;
(v) burglary; and
(vi) motor vehicle theft.

G. A statement of policy regarding--

(i) SLCC's campus sexual assault programs, which shall be aimed at prevention of sex offenses; and
(ii) the procedures followed once a sex offense has occurred.

A statement of SLCC policies addressing the following areas:

(i) Education programs to promote the awareness of rape, acquaintance rape, and other sex offenses.
(ii) Possible sanctions to be imposed following the final determination of an on-campus disciplinary procedure regarding rape, acquaintance rape, or other sex offenses, forcible or nonforcible.
(iii) Procedures students should follow if a sex offense occurs, including who should be contacted, the importance of preserving evidence as may be necessary to the proof of criminal sexual assault, and to whom the alleged offense should be reported.
(iv) Procedures for on-campus disciplinary action in cases of alleged sexual assault, which shall include a clear statement that--

(a) the accuser and the accused are entitled to the same opportunities to have others present during a campus disciplinary proceeding; and
(b) both the accuser and the accused shall be informed to the outcome of any campus disciplinary proceeding brought alleging a sexual assault.

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(v) **Informing students of their options to notify proper law enforcement authorities, including on-campus and local police, and the option to be assisted by campus authorities in notifying such authorities, if the student so chooses.**

(vi) **Notification of students of existing counseling, mental health or student services for victims of sexual assault, both on campus and in the community.**

(vii) **Notification of students of options for, and available assistance in, changing academic and living situations after an alleged sexual assault incident, if so requested by the victim and if such changes are reasonably available.**

H. A statement of policy concerning the monitoring and recording through local police agencies of criminal activity at off-campus student organizations whose participants are students of the institution. The off-campus student organizations are those recognized by the institution, including student organizations with off-campus housing facilities.

I. Statistics concerning the number of arrests for the following crimes occurring on campus:

(i) liquor law violations;
(ii) drug abuse violations; and
(iii) weapons possessions.

J. A statement of policy regarding the possession, use, and sale of alcoholic beverages and enforcement of state underage drinking laws and a statement of policy regarding the possession, use, and sale of illegal drugs and enforcement of federal and state drug laws and a description of any drug or alcohol abuse education programs as required under section 1213 of the Higher Education Act of 1965, as amended. Section 1213 of this Higher Education Act of 1965, as amended, contains the drug free campuses requirements added by section 22 of the Drug Free Schools and Communities Amendments of 1989 (Public Law 101-226).

Implementation Procedure

St. Louis Community College will publish and distribute the following information to all current students and employees and to any applicant for enrollment or employment, upon request, beginning September 1, 1992 and each year thereafter:

A. St. Louis Community College's current campus policies regarding procedures and facilities for students and others to report criminal actions or other emergencies occurring on campus consist of the following elements:

1. St. Louis Community College's policies and procedures have been established in such a manner as to encourage the reporting of all types of crimes to the campus police departments.

2. An emergency network of both external and internal phones exist on all campuses to provide instantaneous, twenty-four hour availability for communication with department personnel. Campus police have access to local police agencies on an immediate basis to either report a crime or request assistance.

3. In addition to use of the phone systems, the College population can also contact the campus police departments in person or in writing. Regardless of how reported, the campus police will investigate all reported incidents.

B. St. Louis Community College's current policies concerning security and access to campus facilities including campus residences and security considerations used in the maintenance of campus facilities include the following elements:

1. Control of keys is primarily the domain of the campus police departments.

2. At all times when the campuses are closed, a valid I.D. card and a statement of purpose are required for entrance to College-owned or leased property.

3. All campuses are well lit with automatic timer features in order to maintain adequate lighting during evening hours. Landscaping is conducive to campus safety.

C. St. Louis Community College's current policies regarding the enforcement authority of campus police and their working relationships with state and local police agencies and the encouragement of accurate and prompt reporting of all crimes to the campus police and the appropriate police agencies include the following elements:

All St. Louis Community College police officers are required to complete 640 state mandated hours

of training in order to be certified by the state of Missouri to conduct arrests and investigations of crimes that occur on campus. They also have police authority on campus property that is leased by the College. All campus police departments work in close cooperation with state and local police agencies.

D. All campus police departments inform staff and students **about campus security procedures** on an on-going basis using a variety of methods including bi-weekly newsletters, campus newspapers, specific campus security publications, Crime Prevention Day, and campus police counseling sessions.

E. All campus police departments inform staff and students **about the prevention of crime** on an on-going basis using a variety of methods including bi-weekly newsletters, campus newspapers, specific campus security publications, Crime Prevention Day, and campus police counseling sessions.

F. All required statistics **relative to statutorily defined criminal offenses** have been and continue to be compiled and will be provided in accordance with federal mandates using St. Louis Community College's Campus Crime Summary form. (Attached) The form will be used by all St. Louis Community College campuses.

G. **St. Louis Community College policy statement on sexual assault programs (actual policy statement to be inserted upon completion) incorporates the following elements:**

(i) Education programs to promote the awareness of rape, acquaintance rape, and other sex offenses.

(ii) Possible sanctions to be imposed following the final determination of an on-campus disciplinary procedure regarding rape, acquaintance rape, or other sex offenses, forcible or nonforcible.

(iii) Procedures students should follow if a sex offense occurs, including who should be contacted, the importance of preserving evidence as may be necessary to the proof of criminal sexual assault, and to whom the alleged offense should be reported.

(iv) Procedures for on-campus disciplinary action in cases of alleged sexual assault, which shall include a clear statement that--

(a) the accuser and the accused are entitled to the same opportunities to have others present during a campus disciplinary proceeding; and

(b) both the accuser and the accused shall be informed to the outcome of any campus disciplinary proceeding brought alleging a sexual assault.

(v) Informing students of their options to notify proper law enforcement authorities, including on-campus and local police, and the option to be assisted by campus authorities in notifying such authorities, if the student so chooses.

(vi) Notification of students of existing counseling, mental health or student services for victims of sexual assault, both on campus and in the community.

(vii) Notification of students of options for, and available assistance in, changing academic and living situations after an alleged sexual assault incident, if so requested by the victim and if such changes are reasonably available.

H. (St. Louis Community College is not required to establish a policy relative to the monitoring and recording through local police agencies of criminal activity at off-campus student organizations given the fact that no off-campus student organizations given the fact that no off-campus housing facilities are operated by St. Louis Community College.)

I. All required statistics relative to the number of campus arrests for statutorily defined criminal offenses have been compiled and will be provided in keeping with federal mandates using the Campus Crime Summary form described in Section F.

J. St. Louis Community College's statement of policy regarding the possession, use, and sale of alcoholic beverages and enforcement of state underage drinking laws and its statement of policy regarding the possession, use, and sale of illegal drugs and enforcement of federal and state drug laws and a description of any drug or alcohol abuse education programs offered by the College can be found in St. Louis Community College's Board Policy 3.37 and in the Student Rights and Responsibilities handbook, page 4, number 8.

All disclosures required by Title II of P.L. 101-542, as amended, will be made in a timely fashion to prospective and current students and employees. The information to be

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disclosed will be presented in an understandable, sensitive format.

The information outlined above will be disclosed through the use of an informational newsletter prepared by the College Police Departments and a Campus Crime Summary Form (see Appendix). In addition, the St. Louis Community College campus community will receive timely reports on certain crimes "reported to campus security authorities or local police agencies" that are considered to be a threat to other students and employees: murder, ~~rape~~ **sex offenses-forcible and non-forcible**, robbery, aggravated assault, burglary, and motor vehicle theft. Timely reporting will occur on an on-going basis using a variety of methods including bi-weekly newsletters, campus newspapers, specific campus security publications, crime prevention days and campus police counseling sessions.

Responsible Department/Office/Individual

Compilation of the information required under this section will be the responsibility of the College Police Departments, as will the preparation and distribution of that information. Inquiries regarding campus security or crime awareness and prevention should be directed to the College Police Departments on the campuses.

Public Release of Campus Crime Reports

In regard to the public release of campus crime reports, St. Louis Community College has chosen to refrain from doing so, pending clarification from the Department of Education and/or the Federal court. The rationale for the College's position is grounded in the present controversy relative to the 1974 privacy-protection law (the Buckley Amendment) and how it impacts institutional responsibility in the area of campus crime reporting.

In cases where ~~alleged~~ victims of violent crimes committed on campus request the results of any disciplinary proceedings conducted by the College, ~~discretion will be exercised by appropriate College staff and each case judged utilizing a student's "need to know" frame of reference~~ **such requests will be considered on a case-by-case basis.**

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Glossary

1. Public Law 101-542 - the Student Right-to-Know and Campus Security Act of 1990.

2. Public Law 102-26 - the Higher Education Technical Amendments of 1991.

3. Cohort - the group of students who enroll at an institution at a specific time or during a specified time frame. The cohort is also the group of students who are followed or tracked. For purposes of disclosure requirements, the cohort consists of full-time, certificate- or degree-seeking undergraduates entering an institution of higher education for the first time. At St. Louis Community College, the initial cohort to be tracked will be established using the fall ~~1991~~ **1989** enrollment, and any students enrolled between July 1, ~~1991~~ **1989** and the fall ~~1991~~ **1989** enrollment who continued into fall enrollment. **This cohort will be tracked through spring 1992.**

4. Full-time Student - an enrolled student who is carrying a full-time academic workload as determined by an institution under a standard applicable to all students enrolled in a particular program. At St. Louis Community College, students carrying a minimum of 12 credit hours are considered to be full-time.

5. First-time Student - a student who is enrolled or accepted for enrollment for the first time at any institution of higher education. High school students taking college courses (dual enrollees) are considered to be first-time students.

6. 150% of Normal Time for Completion or Graduation - for an institution whose programs are two years in length, 150% of normal time for completion or graduation is three years (36 months). For an institution whose programs are one year in length, 150% of normal time for completion or graduation is one and one-half years (18 months). For an institution whose programs are six months in length, 150% of normal time for completion or graduation is nine months (9 months).

7. Graduation - refers to students who receive degrees, certificates or other recognized educational credentials from an institution.

8. Completion - refers to students who transfer from one institution to a higher level program at another eligible institution for which the prior program provided substantial preparation. St. Louis Community College will identify and

track transfer students who qualify to be counted as institutional completers using the following methods:

a. reviewing transcript requests made by students seeking to transfer to four-year institutions. These requests are housed in the College's Central Records Department.

b. reviewing the CBHE Student Achievement Satisfaction Project Report (FAS) published by the Missouri Coordinating Board.

This report provides information on all transfers among post-secondary institutions within the state of Missouri.

~~9. Persistence Rate - the percentage of students in the cohort who re-enrolled each successive year (e.g., fall 1991 to fall 1992) until completion or graduation. In order to be counted in the persistence rate, a member of the cohort must re-enroll for the period for which the following cohort will be established.~~

9. Potential Student Athlete - an individual who contacted the institution for the purpose of requesting information concerning participation in the institution's athletic programs and/or financial assistance available on the basis of participation in these programs, or who the institution contacted for recruitment to the institution's athletic programs.

10. Campus - for disclosure purposes, a campus is defined as follows:

a. any building or property owned or controlled by the institution of higher education within the same reasonably contiguous geographic area and used by the institution in direct support of, or related to its educational purposes; or

b. any building or property owned or controlled by student organizations recognized by the institution.

11. Campus Security Authorities - refers to:

a. any individual or entity specified in an institution's statement of campus security policy as the individual or entity to whom students and others should report criminal offenses, as well as

b. administration officials having primary responsibility for student and campus activities, such as student counselors, deans and campus residence directors.

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Sexual Assault Awareness Program
St. Louis Community College

St. Louis Community College subscribes to the belief that education programs make a difference both in promoting awareness of and prevention of sexual assault on our campuses. In concert with that belief, programs of education related to sexual assault have been developed and will be implemented over the coming academic year. The specific elements of the College's sexual assault programs are outlined below:

1. Sexual Assault Awareness Day/Week

   During the coming school year, a specified time frame will be established for highlighting sexual assault issues on the campus. Activities offered to students, faculty and staff may include guest speakers, topical presentations and workshops.

2. Video Presentations

   Over the course of the school year, students, faculty and staff will be invited to video presentations which will focus on sexual assault issues and concerns.

3. Booklets and Pamphlets

   Beginning in the fall of 1993, a booklet entitled "Avoiding Rape On and Off the Campus" will be distributed to students and staff through designated offices on the campuses.

4. Articles in Campus Publications

   On a recurring basis, articles will be run in campus-based newsletters and student newspapers alerting students and staff to sexual assault issues both on and off the campus.

5. Resource Fairs

   Resource Fairs may be held on the campuses to serve as sources of additional information for students and staff. Representatives of agencies such as Aid to Victims of Crime and The Women's Rape Crisis Center may be invited to the campuses to do presentations.

6. Posters

   At strategic points across our campus locations, posters addressing sexual assault issues will be displayed.

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St. Louis Community College
at Florissant Valley

Campus Police
3400 Pershall Road
St. Louis, Mo. 63135-1499

The attached information is being furnished in compliance with Title II of the Campus Crime Awareness Act and Campus Security Act of 1990.

Information covers the policies and procedures of St. Louis Community College at Florissant Valley governing the reporting of crimes, building access, authority of the College Police, and how the College Police department cooperates with other police agencies. Policies and procedures also cover problems relating to alcohol and drug abuse on campus.

Crime statistics listed have been reported to the College Police for the past three years. If you desire further information on other incidents reported, contact the office of the College Police.

Campus Police Chief

St. Louis Community College's current campus policies regarding procedures and facilities for students and others to report criminal actions or other emergencies occurring on campus consist of the following elements:

1) St. Louis Community College's policies and procedures have been established in such a manner as to encourage the reporting of all types of crimes to the campus police departments.

2) An emergency network of both external and internal phones exist on all campuses to provide instantaneous, twenty-four hour availability for communication with department personnel. Campus police have access to local police agencies on an immediate basis to either report a crime or request assistance.

3) In addition to use of the phone system, the college population can also contact the campus police departments in person or in writing. Regardless of how reported, the campus police will investigate all reported incidents.

St. Louis Community College's current policies concerning security and access to campus facilities including campus residences and security considerations used in the maintenance of campus facilities include the following elements:

1) Control of keys is primarily the domain of the campus police departments.

2) At all times when the campuses are closed, a valid I.D. card and a statement of purpose are required for entrance to college-owned or leased property.

3) All campuses are well lit with automatic timer features in order to maintain adequate lighting during evening hours. Landscaping is conducive to campus safety.

St. Louis Community College's current policies regarding the enforcement authority of campus police and their working relationships with state and local police agencies and the encouragement of accurate and prompt reporting of all crimes to the campus police and the appropriate police agencies include the following elements:

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1) All St. Louis Community College police officers are required to complete 640 state mandated hours of training in order to be certified by the state of Missouri to conduct arrests and investigations of crimes that occur on campus. They also have police authority on campus property that is leased by the College. All campus police departments work in close co-operation with state and local police agencies.

All campus police departments inform staff and students on an on-going basis using a variety of methods including bi-weekly newsletters, campus newspapers, specific campus security publications, Crime Prevention Day, and campus police counseling sessions.

All required statistics have been and continue to be compiled and will be provided in accordance with federal mandates using St. Louis Community College's Campus Crime Summary form. The form will be used by all St. Louis Community Colleges campuses.

St. Louis Community College is not required to establish a policy relative to the monitoring and recording through local police agencies of criminal activity at off-campus student organizations given the fact that no off-campus housing facilities are operated by St. Louis Community College.

All required statistics have been compiled and will be provided in keeping with federal mandates using the Campus Crime Summary form.

St. Louis Community College's statement of policy regarding the possession, use and sale of alcoholic beverages and enforcement of state underage drinking laws and its statement of policy regarding the possession, use and sale of illegal drugs and enforcement of federal and state drug laws and a description of any drug or alcohol abuse education programs offered by the College can be found in St. Louis Community College's Board Policy 3.37 and in the Student Rights and Responsibilities handbook, page 4, number 8.

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